The Pirate Academy Handbook

Volume 6: The Cybersecurity Act 2 (CSA2): Facilitator notes

The Pirate Academy was made possible by the Greens/EFA group in the European Parliament. The Pirate Academy was created by Paul Diegel and David František Wagner for MEP Markéta Gregorová. This handbook and the revised versions of all scenarios were prepared by David František Wagner.

Positions in this scenario are fictionalised for educational purposes and inspired by, but not identical to, publicly reported positions. Roles are institutional functions, never named living individuals.

Chapter 1 - Running this scenario

What is this?

A two-day, in-person simulation of a trilogue on a real, live file: the **Cybersecurity Act 2 (CSA2)**, proposed by the Commission on 20 January 2026. Participants negotiate a thirteen-article teaching version of its most contested part: how the Union designates high-risk vendors of critical technology, how fast their equipment has to go, who certifies technology, what rights a designated vendor has, and how far the rules reach.

Participants play three **teams**: the European Parliament (five political groups, led by the Greens/EFA rapporteur), the Council (five member states, chaired by the Irish presidency) and the European Commission (one player, the Director-General, with an optional second player from the Legal Service). Each team has three public goals. Each player also has a **secret card** with three personal goals, and the hardest of them usually pulls against the player's own team.

On day 1, the Parliament and the Council each build a **mandate**. On day 2, all three institutions meet in a single **trilogue** on a **four-column document**, react to outside events (**injects**), fill in a **reputation form**, and vote on a final text. Then all secret cards are revealed and scored.

This is a **Tier 4 scenario** of the Pirate Academy sequence (Volume 1, Chapter 2): full legislative trilogue over two days, article-by-article work on a draft law, secret individual objectives, scoring, a reputation form and timed injects. It assumes participants have played at least two earlier scenarios and know what a mandate, a bracket and a qualified majority are. It is designed as the in-person finale of the course, or one of two finale scenarios together with Volume 5.

The scenario's one big idea: **every institution is a team, and every team is made of people with their own agendas.** Volume 5 teaches that money decides the content of a file. Volume 6 teaches that the content is shaped just as much by who decides later (the Commission, the member states, the Parliament) and by the private interests of the people at the table.

What you need

- **Facilitation:** two facilitators recommended, one minimum. The **lead facilitator** is the neutral referee and joint secretariat: keeps the four-column document, announces voting thresholds, counts votes, scores the team goals and rules on anything the rules do not cover; the lead facilitator never chairs the table. The **second facilitator** runs the world: clock, injects, the inject log, the reputation forms and observation notes for the debrief. The facilitators never play a role (Volume 1, Chapter 5).

- **Participants: 11 as the designed cast** (the Commission, five member states, five political groups); 12 or 13 with the optional roles (the Commission's Legal Service and Poland). The standard course (Volume 1, Chapter 3) sends 12 participants to the in-person finale, which gives the designed cast plus the Legal Service. Below 11, see the cut order in the casting guide (Chapter 5); the Commission, the presidency, the rapporteur and the EPP are never cut. From 16 on, run two parallel tables and a joint debrief.

- **Time: day 1, about 3.5 hours**; **day 2, about 8 hours** with breaks. The two days need not be consecutive, but any gap weakens the experience.

- **Rooms:** one plenary room with one table for everyone; two institution rooms (Parliament and Council) for day 1 and for caucusing on day 2; two or three corners for bilaterals. The Commission has no room of its own; it moves between the rooms.

- **Before the session:** the general factsheet, the Commission proposal and the role handouts posted about one week ahead.

Materials checklist

Before the session you should have prepared:

1. The **general factsheet** (separate document), with the rules, the coalition table, the team goals, the reputation rules, the mandate template (Annex A) and the four-column template (Annex B).

2. The **Commission proposal** (separate document): the thirteen-article teaching text with Annex I and the decision map. Printed, one copy per participant, plus the shared digital version.

3. Eight to thirteen **role handouts** (separate documents), sent individually. Each participant sees only their own. Unused roles are not sent.

4. **Scorecards**: the last page of each role handout, printed for the reveal.

5. The **four-column document** as a shared digital document (Commission proposal | Parliament mandate | Council mandate | compromise text; template in the factsheet, Annex B), and two empty **mandate templates** (factsheet, Annex A), one per institution, as editable working copies.

6. The **reputation form** (separate document), one per participant, printed.

7. The **inject pack** (Chapter 7.3), printed and ready to paste into the channel.

8. The **run-sheet** (separate document).

9. An **inject log** sheet for the second facilitator (Appendix A): time of each inject, written amendments tabled in reaction and by whom, joint statements and who agreed them, signed side agreements, written declarations, and the vote record (whether the final package passed at the first vote).

10. The **communication templates** (Chapter 8), adapted with your dates.

Tech checklist

The scenario is played in person, but the text lives in shared documents.

- The four-column document is readable by all participants and editable by the lead facilitator. Each institution has its own working copy for day 1 that it can edit freely.

- A projector or large screen in the plenary room shows the four-column document.

- A messaging channel (Discord, Signal group or similar) reaches all participants at once for time calls and injects. A private channel to each facilitator exists, and each team has its own channel.

- Every participant has a device that can open and edit documents. Each team needs at least two laptops.

Timeline around the scenario

When	**What**
about 7 days out	Post the general factsheet and the Commission proposal; announce the cast and the voting rules; send role handouts individually (this can also be done 3 days before the scenario, not later)
1 day out	Final cast check; apply the cut order if somebody dropped out; prepare printed materials, the coalition table and the verification circle for the actual cast
Day 1	Briefing, team caucuses, hearings, corridor talks, mandate votes; the lead facilitator builds the four-column document and posts it to everyone the same evening
Day 2	Trilogue, reputation form, final votes, reveal, debrief
After	Post-session message with possible homework within 24 hours (template, Chapter 8)

Chapter 2 - What this scenario teaches

Learning objectives

By the end of the scenario and its debrief, participants should be able to:

1. **Work on a legal text article by article** in a four-column document, and see how a change in one article moves the balance in another.

2. **Explain the fight over implementing powers:** why "the Commission decides by implementing act" or "the member states agree" or "the Parliament may object" is often the hardest part of a file, and what comitology is.

3. **Count a blocking minority** in the Council and a majority in a weighted Parliament.

4. **Describe the tension between institutional and personal interests:** why an institution's position is a compromise among people who each answer to someone else (a capital, a party, a career).

5. **Weigh security, cost and rights** in supply chain security: speed of phase-out against cost, designation powers against due process, breadth of scope against proportionality.

6. **Compare the room's result with reality:** the real CSA2 proposal and the state of the real negotiation.

Why the Cybersecurity Act 2

The file is real and current. Since the 5G Toolbox of 2020, the EU has tried to limit high-risk vendors through recommendations, and most member states did not act. CSA2 would turn that into binding Union law. It touches almost every theme of the course: security and geopolitics, the single market, national sovereignty, the power of the Commission, the rights of companies, and the cost of all this for consumers. It also has an unusual feature for a training scenario: nobody knows the outcome yet. Participants can follow the real file after the course.

What this scenario does not do

- It does not teach cyber security as a technical subject. The technology is the background; the subject is the decision.

- It does not reproduce the real 122-article proposal. Certification, ENISA's mandate and the designation of third countries are simplified or folded into the teaching text.

- It does not model the full Council (27 states, qualified majority) or the full Parliament.

- It does not tell participants who is right. China, the United States and the vendors are also not in the room.

Chapter 3 - The context: facilitator background

This chapter is for facilitators. Participants receive a shorter version in the general factsheet.

From the 5G Toolbox to CSA2

In January 2020, the member states and the Commission agreed the **EU 5G Toolbox**: a set of recommended measures, including restrictions on high-risk suppliers in critical parts of 5G networks. It was voluntary. On 15 June 2023, the Commission stated that Huawei and ZTE "represent in fact materially higher risks than other 5G suppliers" and announced that it would avoid exposure of its own corporate communications to networks using them. At that time 24 member states had adopted or were preparing powers to restrict suppliers, but only 10 had actually imposed restrictions.

National approaches differ widely. France introduced an authorisation regime for mobile network equipment in 2019. Germany agreed with its operators on 11 July 2024 that Huawei and ZTE components would leave 5G core networks by the end of 2026 and critical functions of network management systems by the end of 2029. Czechia's cyber security agency NÚKIB warned against Huawei and ZTE technology on 17 December 2018, and on 3 September 2025 issued a warning about data transfers to China and remote administration from China, naming among others inverters, IP cameras, smart meters and connected cars. Lithuania passed a law on 12 November 2024 barring remote access by Chinese companies to solar, wind and storage installations above 100 kW, in force from 1 May 2025. In Spain, a contract of about EUR 12.3 million under which the Interior Ministry used Huawei storage for lawful-interception data caused a controversy in July 2025.

Why it became urgent

- **Salt Typhoon.** In autumn 2024 it became public that Chinese state-linked hackers had broken into major US telecom operators; the FBI and CISA confirmed it on 13 November 2024.

- **Inverters.** On 14 May 2025, Reuters reported that US experts had found undocumented communication devices in some Chinese-made solar inverters and batteries connected to the grid.

- **The Baltic Sea.** On 25 December 2024, the Estlink 2 power cable and several data cables in the Gulf of Finland were damaged; Finland seized the tanker Eagle S.

- **Washington.** On 25 August 2025, the US President threatened substantial additional tariffs and export restrictions on chips against countries with digital taxes or digital regulations that "discriminate against" American technology.

The real proposal

On 20 January 2026, the Commission proposed a regulation on ENISA, the European cybersecurity certification framework and ICT supply chain security, repealing Regulation (EU) 2019/881: the **Cybersecurity Act 2** (COM(2026) 11, procedure 2026/0011(COD)). It came as a package with a targeted amendment of the NIS2 Directive. Its main parts:

- **Title II, ENISA:** a stronger agency (early warning, support in incident response including ransomware, vulnerability services, a single entry point for incident reports).

- **Title III, certification:** the European cybersecurity certification framework remains voluntary unless Union or national law says otherwise, extends to the "cyber posture" of entities and gives ENISA deadlines for preparing schemes.

- **Title IV, ICT supply chain security:** the Commission may designate, by implementing act under the examination procedure, third countries "posing cybersecurity concerns to ICT supply chains" (Article 100); it identifies key ICT assets (Article 102), may prohibit the use of components from high-risk suppliers in them (Article 103) and lists high-risk suppliers (Article 104). For mobile, fixed and satellite networks, the key assets are listed in Annex II, and components from high-risk suppliers must be phased out, for mobile networks within at most 36 months of the publication of the relevant list of high-risk suppliers (Article 110). Penalties go up to 7% of worldwide annual turnover for breaching the prohibitions (Article 115).

The state of play in autumn 2026

- **Council:** the Horizontal Working Party on Cyber Issues worked on the file under the Cyprus presidency (a progress report went to Coreper in May 2026) and continues under the Irish presidency. There is no general approach yet. In late September 2026 Reuters reported a member-state text that drops the fixed 36-month deadline for mobile networks in favour of case-by-case timing.

- **Parliament:** the lead committee is ITRE. The rapporteur, appointed on 26 February 2026, is a Greens/EFA member[1], with shadow rapporteurs from all other groups. IMCO and BUDG give opinions; the IMCO opinion vote is scheduled for 15 October 2026.

- **Trilogues** have not begun.

The member states' written comments in 2026 concentrated on the questions this scenario uses: who designates (several delegations treat it as a national security matter that cannot rest on a Commission implementing act), the legal certainty of the high-risk supplier test, transition periods, the reach of the annexes and the proportionality of the penalties.

Update this section before each run.

The scenario's setting

The scenario is set in **Brussels in November 2026**, under the **Irish presidency** (July to December 2026), and imagines that both institutions are ready to adopt their positions and go straight into a political

[1]In reality, the rapporteur was Markéta Gregorová.

trilogue. That is faster than reality. Ireland is a useful presidency for the scenario: it hosts the European headquarters of the largest American technology companies, data centres used 23% of its metered electricity in 2025, and the US inject touches it directly.

Where the scenario bends reality

- The real proposal has 122 articles and two annexes. The teaching text has thirteen articles and one annex, and it designates vendors directly instead of designating third countries first.

- The teaching proposal lets the Commission amend Annex I by implementing act; in EU law, amending an annex of a regulation is normally done by delegated act, to which the Parliament and the Council can object.

- In the real proposal, designations are made by **implementing act under the examination procedure**: a committee of member-state representatives can block them by qualified majority (comitology). The teaching proposal gives the Commission a plain decision after consultation, to make the question "who decides" sharper.

- The real phase-out for mobile networks is up to 36 months; the teaching proposal opens at 18 months to give the Council something to fight for.

- The real trilogue has not begun; the setting is hypothetical.

- The Council has five states; the qualified majority is replaced by "no more than one against". Parliament groups vote as blocs; ECR, The Left and ESN are not in the room.

- The Commission is one participant (two with the Legal Service); in reality it is a college of 27 Commissioners and many services with different views, and its internal differences are settled inside the house.

- The positions of named governments and groups are fictionalised.

Chapter 4 - Rules and mechanics

This chapter is the reference for every rule of the scenario. The factsheet gives participants the same rules in shorter form. When a situation is not covered, the lead facilitator rules, following the intent of the rules rather than their wording (rule zero, Volume 1, Chapter 5).

The cast

Team	Role	Notes
Parliament	Greens/EFA (53 seats)	rapporteur; leads the team; never cut
Parliament	EPP (188 seats)	core; never cut
Parliament	S&D (136 seats)	core
Parliament	Renew Europe (77 seats)	core; first cut (10)
Parliament	Patriots for Europe (84 seats)	core; third cut (8)
Council	Ireland	presidency; leads the team; never cut
Council	France	core
Council	Germany	core
Council	Finland	core
Council	Czechia	core; second cut (9)
Council	Poland	optional (13th role)
Commission	Director-General	core; plays the Commission; never cut
Commission	Legal Service	optional (12th role)

Each role is played by one participant. Roles represent a government, a political group or an institutional function, never a named person. If only one of the optional roles is cast, the Legal Service comes first: a second Commission player lets the Commission work both institutions at once, one negotiating while the other drafts.

The decision rules

Council

A text is adopted if no more than one member state present votes against: 4 of 5, 5 of 6 with Poland, or 3 of 4 with a reduced cast. Abstention counts as not against. This replaces qualified majority voting; say so

in the briefing. The rule makes the **blocking minority** visible: no state can block alone, two states together can.

Commission opposition

If the Commission opposes the final text, the Council must decide unanimously; abstention then counts as against. This is a simplified Article 293 TFEU. If the Legal Service is cast, the two Commission players agree the position together before the final votes; if they disagree, the Director-General decides. The Director-General announces the position.

Parliament

Groups vote as blocs with their seats. **361 seats in favour** (a majority of 720) are needed. Unplayed groups count as not in favour. The Parliament and the Council always both vote, even if the other has already rejected the text. With the designed cast, no majority is possible without the EPP; the EPP needs the S&D plus one more group, or Renew, the Greens/EFA and the Patriots together. With Renew cut (10 players or fewer), the S&D also becomes indispensable; with the Patriots also cut (8), all three remaining groups must vote in favour.

Mandates

On day 1 the Parliament and the Council each vote a mandate under the same rules, in their own rooms, with the lead facilitator present to check the mandate and announce the threshold; the Commission may attend both votes. A mandate says, for every article and for Annex I, “accept”, “delete” or a full replacement wording; new articles and recitals go in full wording (template in the factsheet, Annex A). One retry after ten minutes. If a mandate vote fails twice, the institution enters the trilogue without a mandate: each of its members sends the lead facilitator a filled mandate template the same evening, its column in the four-column document shows those individual positions, and its members negotiate individually. That is not an outcome of the scenario.

Final votes and retry

After the final package, the Director-General announces the Commission’s position, then the Council votes, then the Parliament; both always vote. If either vote fails, the Director-General may table one revised package within 15 minutes, and both institutions vote again, the Council first. A second failure is final: no act.

Withdrawal

The Commission may withdraw its proposal at any time before the Council’s final vote (the Director-General decides). The scenario then ends without an act, and every team scores -5. It is almost never in the Commission’s interest; the threat can still be used as a bluff.

Default rule

Where no compromise text has been agreed for an article, a paragraph or an item of Annex I by the end of the final package, the Commission text fills the gap. The result is one consolidated text (the compromise column with the Commission text in the gaps), and that whole text is what the two institutions vote on: the default never adopts anything by itself. Make sure everyone understands what the gaps mean: 18 months, 7%, eleven sectors, a Commission decision after consulting the member states, and no right of objection for the Parliament.

The working documents

- **The Commission proposal:** the teaching text, the Commission team's opening position: five recitals, thirteen articles and Annex I. Its numbering is kept throughout; new articles are numbered 6a, 9a and so on. Participants may amend the recitals or add their own. Recitals do not bind: team goals are tested on the articles and Annex I only; a secret goal that says "in a recital or an article" is met by either.

- **The mandates:** each institution's position on every article and on Annex I (mandate template, factsheet Annex A), prepared in its own working copy on day 1.

- **The four-column document:** built by the lead facilitator overnight from the two mandates (template in the factsheet, Annex B). Articles where both mandates agree are marked green and copied into the compromise column as agreed text; like any provisional agreement they can be reopened until the final vote. Where one column holds individual positions (no mandate), an article is green only if every individual position agrees with the other mandate. Write a one-line summary of the main divergence at the top of each other article. Do not draft compromises: that is the Commission's job, though anyone may propose wording. The lead facilitator enters every proposal tabled at the table, marked with its author, and is the only person who edits the document, so that there is one authoritative version; participants work in their own copies. It is posted to everyone the same evening.

- **Provisional agreement:** text in the compromise column counts as agreed when the chair of the round asks for objections and the same simple thresholds as in the final votes are met: no more than one Council member present objects, and the Parliament groups that do not object together hold at least 361 seats; groups not played count as objecting. The Commission may object, but its objection does not count; its opposition power and the unanimity trigger apply only to the final votes. The lead facilitator counts and marks the text. Any provisional agreement can be reopened until the final vote.

- **Joint statements:** short texts agreed by the Director-General, the presidency and the rapporteur in reaction to an inject, read out to the whole room (after inject 1, at the opening of day 2) and handed to the second facilitator. They are not part of the act. They matter for one secret goal.

- **Side agreements:** written, signed commitments outside the act. They may be secret; a copy goes to the second facilitator, and they are read out at the reveal.

- **Written declarations:** a player may hand the second facilitator a short signed declaration at any time (for example that a group will vote against the final text). Declarations are logged and matter only where a secret card says so.

Chairing

The lead facilitator never chairs. Day 1 hearings are chaired by the rapporteur and the presidency in turn. On day 2 the table decides at the opening who chairs which round, choosing among the Director-General, the rapporteur and the presidency; the final package and the votes are chaired by whoever the table chose for them. The chair keeps their role and vote. If the table cannot agree within five minutes, the presidency chairs round 1 and the final package, the rapporteur rounds 2 and 4, and the Director-General round 3.

The phase structure

Phase	**Purpose**
Day 1 briefing	Rules, thresholds, scoring; secret cards read
Team caucus	The Parliament and the Council agree their line on Q1 to Q5; the Commission visits both
Opening hearings	Each institution states its position; first public signals
Corridor talks	Bilaterals; inject 1; first coalitions across institutions
Mandate votes	Parliament and Council fix their positions
Trilogue rounds 1 to 4	Easier questions first (Q3, Q5), then the crux (Q1, Q2), then Q4 and open issues; injects 2 to 4
Reputation form	Before the outcome is known
Final package and votes	One consolidated text (defaults applied), the Commission’s position, two votes, possibly one retry
Reveal and scoring	Cards face up, team and secret goals scored, reputation

Phase	Purpose
Debrief	Learning

The injects

Four injects are prepared, at fixed times (Chapter 7.3). Play at least two and say at the briefing how many you will play. They never change a rule or a score. They matter for two secret goals: the rapporteur scores only if she or he tables a written amendment after every inject played, and the Director-General scores if the act is adopted and at least two injects received a joint statement.

Scoring

Team goals

Each team has three public goals scored 0, 1 or 2 against the final text (tests in the factsheet). Maximum 6. If no act is adopted, every team scores **-5**. The lead facilitator scores the team goals on screen at the reveal; each team may contest one item, and the lead facilitator rules immediately.

Secret goals

Each card has three goals worth 1, 2 and 3 points, all or nothing. Maximum 6. Goals that test the text score only if an act is adopted. Two goals score without an act, as written on the card: S&D goal 3 (the reputation form) and Patriots goal 3 (no act and the Patriots voted against, or declared in writing that they would). The team score of -5 still applies to them.

Reputation

From the reputation forms, collected before the final package:

- named most helpful by at least two teammates: +1;
- named most problematic by at least two teammates: -1;
- a team of one or two (the Commission) skips the teammate questions and cannot score these two points;
- each team's media balance is supports minus criticisms; members of the team with the highest balance get +1, members of the team with the lowest balance get -1; ties share the result; if all three tie, nobody gets anything. The Commission is judged by more players than the other two teams (everyone else names it or not); say so in the debrief if it matters.

Range: -2 to +2.

Personal score

team score + secret goals + reputation, from -7 to 14. One ranking of all players. In the debrief, the ranking matters less than the reasons behind it. The scoring is not meant to be competitive and fair: different stakeholders have extremely asymmetric positions.

The no-deal logic

A failed file costs every team 5 points, so every player starts with a strong interest in an act. No player gains from failure in points: the Patriots lose less than anyone (-5 and their 3-point hard goal, so -2 against everyone else's -5) and would win the ranking, and a few players prefer a weak act to a strong one. Killing the act is possible, and two member states or a few Parliament groups can do it; the scoring makes sure it has a price.

The verification circle

At the reveal, each player hands their scorecard to a verifier from another team, who checks the secret goals against the final text, the inject log, the vote record and the reputation results. Procedure: the lead facilitator first projects the consolidated final text (the compromise column with the defaults applied); the facilitators announce who verifies whom; 15 minutes of checking with the text, the log and the card; the verifier marks each goal and reads out the total; the player may contest one item, and the lead facilitator rules at once (Chapter 7.5). The second facilitator confirms to a verifier any log entry or reputation tally the card depends on. The circles ("→" means "verifies"):

- **11** (designed cast): Greens/EFA → Ireland → Director-General → EPP → France → S&D → Germany → Renew → Finland → Patriots → Czechia → Greens/EFA.

- **12** (with the Legal Service): Greens/EFA → Ireland → Director-General → EPP → France → S&D → Germany → Renew → Finland → Legal Service → Patriots → Czechia → Greens/EFA.

- **13** (also with Poland): Greens/EFA → Ireland → Director-General → EPP → France → S&D → Germany → Legal Service → Czechia → Renew → Finland → Patriots → Poland → Greens/EFA.

- **10** (no Renew): Ireland → Greens/EFA → France → EPP → Germany → S&D → Finland → Patriots → Czechia → Director-General → Ireland.

- **9** (also no Czechia): Ireland → Greens/EFA → France → EPP → Germany → S&D → Finland → Patriots → Director-General → Ireland.

- **8** (also no Patriots): Ireland → Greens/EFA → France → EPP → Germany → S&D → Finland → Director-General → Ireland.

For any other cast, close the circle so that nobody verifies a member of their own team. Verification has the same purpose as peer scoring in Volume 5: it makes every participant read the final text closely and shows them what someone else was really after.

The lead facilitator

The lead facilitator is neutral and has no interest in the outcome. The lead facilitator keeps the four-column document, announces thresholds, counts the votes and provisional agreements, scores the team goals, rules on disputes about tests (Chapter 7.5) and applies rule zero, but never chairs: the chair of each round is one of the participants (see Chairing above). The second facilitator plays the outside world, keeps the clock, the inject log, the declarations and side agreements, and the reputation tallies.

What counts as an outcome

- **Adopted act:** the Council and the Parliament both adopt the same final text. Score everything against it.
- **No act:** a final vote fails twice, or the Commission withdraws. Every team scores -5; secret goals score only where the card says so.
- **Mandate failure on day 1** is not an outcome; the trilogue still happens.

There is no partial agreement: the institutions vote on one consolidated text, in which the Commission text fills every gap left in the compromise column.

Chapter 5 - Casting guide

These are recommendations. Your teaching needs might justify other solutions.

Role ratings

Role	**Speaking demand**	**Notes**
Greens/EFA (rapporteur)	high	leads a team in which the group itself is the smallest; must react to every inject
EPP	high	pivot of the Parliament; secretly works against the team’s power goal

Role	Speaking demand	Notes
S&D	medium	the bridge; scores on being seen as helpful
Renew Europe	medium	quiet ally of the Council; must not get caught
Patriots for Europe	medium	the spoiler; the only player who loses less than everyone else if the act fails
Ireland (presidency)	high	chairs the Council; needs a deal and needs to hide it
France	medium	national control and a trusted-vendor label; its hard goal trades away the Council's national certification
Germany	medium	installed equipment and costs; can block only with a partner
Finland	medium	the hawk; breaks with its own team on speed
Czechia	medium	the go-between who wants a prize, and needs a second member state to sign for it
Poland (optional)	medium	security hawk with a transatlantic line; wants automatic designation of aggressors' vendors
Director-General	high	is the Commission: holds the pen, needs a deal and a strong designation power
Legal Service (optional)	medium	the Director-General's partner: drafts the compromises and makes the Commission's wins hold up in court

Cast sizes

Participants	**Cast**
13	full cast with both optional roles
12	designed cast plus the Legal Service
11	designed cast: the Director-General, five member states, five groups
10	without Renew Europe (the S&D becomes indispensable in the Parliament)
9	also without Czechia (Council of four: 3 of 4)
8	also without the Patriots (the Parliament must vote as a whole)
14 to 15	add a second person to the presidency and to the rapporteur (one negotiates, one drafts)
16 or more	two parallel tables with the same cast and a joint debrief

Do not merge roles. With reduced casts, the Parliament threshold stays at 361 seats and groups not played still count as not in favour; the Council rule stays “no more than one against” (3 of 4). Recompute the coalition table and the verification circle (Chapter 4) for the actual cast.

Friction, boxed-out risks and comeback moments

- **The Patriots** can be ignored if the centre builds its majority without them. Their comeback moment is any question where the EPP wants a majority without the S&D, or a vote where the Greens/EFA defects.

- **The Commission** is one player against ten or more. If the Director-General stays at the table and only reacts, the second facilitator can remind them that they hold the pen: compromise wording is their main tool. With the Legal Service cast, the two should work as one team (one negotiates, one drafts, and they swap rooms). If the Legal Service only sits next to the Director-General, suggest that it takes over the drafting of one question.

- **Czechia** can be squeezed between France and Germany. Its comeback moment is inject 2.

- **Finland** often ends up alone in the Council. Its natural partners are in the Parliament (the EPP and the rapporteur).

- **Pairs that fight:** Finland and Germany (naming countries, speed); the Legal Service, if cast, and Finland or the EPP (can ground (a) stand alone?); the EPP and the rest of its own team (the Parliament's right of objection); Ireland and the rapporteur (cloud); Poland and the Council's own line (automatic designation); France and the Council's own line (Union certification).

Chapter 6 - The handout set: who gets what

Document	**Who**	**When**
General factsheet	everyone	about 7 days before
Commission proposal	everyone	about 7 days before; printed on day 1
Role handout (with secret card and scorecard)	each participant, their own only	about 7 days before, not later than 3 days before
Reputation form	everyone	day 2, before the final package
Four-column document	everyone (read); the Director-General also gets an editable copy for drafting	evening of day 1
Facilitator notes and run-sheet	facilitators only	before the session

The team goals are public: they are in the factsheet and in every handout. The secret goals are only in each player's own handout.

Chapter 7 - Facilitator guide

7.1 Before the session

Brief the lead facilitator. The lead facilitator should read Chapters 3 and 4 twice and know the default rule, the thresholds and the team tests by heart.

Brief the three team leaders. Offer the rapporteur, the presidency and the Director-General a 15-minute conversation before day 1 about their role (chairing, speaking for the team, the Commission's powers). Do not discuss strategy and do not mention anyone's secret goals.

Name the out-of-game contact. One organiser is the point of contact for anything that happens outside the game during the two days, including the evening programme (Volume 1, Chapter 7). Say who it is in the briefing.

Prepare the room and documents. Two institution rooms, one plenary table. Two empty mandate templates (factsheet, Annex A) as editable working copies. The four-column template (factsheet, Annex B) with the Commission proposal in the first column. Reputation forms. The inject log (Appendix A).

Check the cast. Apply the cut order if needed, and recompute the coalition table, the Council threshold and the verification circle for the actual cast.

7.2 The timeline

Day 1 (about 3.5 hours)

Time	Block	Notes
0:00	Briefing (all)	name the out-of-game contact; rules, thresholds with the coalition table, Commission powers, default rule, scoring and the -5, reputation form, number of injects, etiquette (including no recording) and tap-out; secret cards read in silence
0:30	Team caucus	Parliament and Council agree their line on Q1 to Q5 and fill in their mandate template; the Commission moves between the rooms
1:15	Opening hearings	Commission, Parliament, Council, 5 minutes each, then questions
1:55	Break	
2:05	Inject 1, corridor talks	free movement, bilaterals
3:00	Mandate votes	lead facilitator in each room; one retry (a retry pushes the close to about 3:40)

Time	Block	Notes
3:30	Close	mandates frozen

Day 2 (about 8 hours with breaks)

Time	Block	Notes
9:00	Opening	four-column document; Commission's opening compromise; 60-second statements; the table agrees who chairs which round
9:20	Round 1: Q3 and Q5	inject 2 at about 9:45
10:30	Break	
10:45	Round 2: Q1	the crux
12:00	Lunch	lead facilitator updates the compromise column
12:45	Inject 3, Round 3: Q2	
13:45	Break	
14:00	Inject 4, Round 4: Q4 and open issues	
14:45	Reputation form	collected by the second facilitator
14:55	Final package	Director-General presents; the chair lists open articles; the lead facilitator reads out the consolidated text with the defaults applied
15:30	Final votes	Commission position; Council; Parliament; one retry (revised package within 15 minutes)
15:45	Reveal and scoring	consolidated final text on screen first

Time	Block	Notes
16:25	Debrief	
17:10	End	

Critical blocks: the briefing, the mandate votes, the reputation form, the final package, the final votes, the reveal and the debrief. If you lose time, shorten rounds 1 and 4 and the opening hearings. A failed final vote and its retry take up to 30 minutes; take the time from the reveal, not from the debrief. The table may change the order of questions; let it, but keep the injects at their times (the rapporteur's inject deadlines are tied to the injects, not to the round numbers).

7.3 The inject pack

Read each inject aloud and post the text. Then note in the log who reacts and how. Injects never change a rule or a score.

Inject 1: The operators' letter

When: day 1, at the start of the corridor talks (around 2:05). Fixed time.

Purpose: put the cost of the phase-out on the table before mandates close.

Text:

BREAKING, Brussels. Europe's largest telecom operators have written to the Irish presidency and to the rapporteur. They say that removing equipment from designated vendors within 18 months would cost the sector "several billion euro", delay the roll-out of new networks and force price increases for consumers across Europe. They ask for "no less than five years", for equipment already installed to be left alone where it is not in the core of the network, and for EU funding of any replacement. A consumer organisation replies that "customers should not pay for decisions that operators made to save money".

Facts and fiction: operators have made cost arguments in every national debate on high-risk vendors. This letter is fictional.

Likely effects: Germany, France and Renew use it; the S&D and Germany ask for support; Finland and the rapporteur insist that security has a price.

Inject 2: Ransomware in Prague

When: day 2, about 25 minutes into round 1 (around 9:45). Fixed time.

Purpose: bring the question of speed and national room back to the table with a concrete attack.

Text:

BREAKING, Prague. Attackers have encrypted the systems of the Czech social security administration and claim to have stolen the personal data of millions of insured persons. They demand a ransom and threaten to publish the data. The national cyber security agency says the attackers entered through remote maintenance access to network equipment supplied by a third-country vendor. The Czech government asks for European solidarity and says that "one day, a warning is not enough".

Facts and fiction: the attack is fictional. NÚKIB's warnings of 2018 and 2025 are real (Chapter 3). If you run the scenario with a group for which this inject would be too close to home, replace the country with another member state in the cast.

Likely effects: Czechia moves towards faster action but also towards national room; Finland and the rapporteur push for urgency procedures; the Commission proposes provisional designation; the Patriots argue for action only after attacks.

Inject 3: Washington's letter

When: day 2, as participants return from lunch, before round 3 (around 12:45). Fixed time.

Purpose: make ground (a) and the scope of cloud services a transatlantic question.

Text:

BREAKING, Brussels and Washington. The United States mission to the EU has sent a letter to the Commission and to the capitals. Washington "supports European efforts against vendors controlled by adversarial states", but warns that any text which could designate American companies because of American law (it mentions the CLOUD Act) "would be treated as discrimination". The letter recalls the President's statement of August 2025 threatening tariffs and export restrictions on chips against countries whose digital rules "discriminate against" American technology. The Commission spokesperson says the act is "country-neutral and fully compatible with the EU's international obligations".

Facts and fiction: the statement of 25 August 2025 and the CLOUD Act (2018) are real. The letter is fictional.

Likely effects: Ireland and Renew push for a "trusted partners" clause; the Legal Service presses on ground (a); Finland and the EPP warn against letting Washington write EU law; the Patriots welcome it.

Inject 4: Inverters

When: day 2, at the start of round 4 (around 14:00). Fixed time.

Purpose: show that the risk is not only in telecom networks, and test the scope and the list of critical technologies at the last moment.

Text:

BREAKING. A national cyber security agency of a member state reports that it has found undocumented communication modules in solar inverters and home batteries from Chinese manufacturers, connected to the electricity grid. In many member states inverters are not on any list of critical technology. The agency asks the trilogue whether the Cybersecurity Act 2 "covers the grid at the level of every rooftop".

Facts and fiction: Reuters reported similar findings in the United States on 14 May 2025; Lithuania has barred Chinese remote access to installations above 100 kW since May 2025; NÚKIB warned about inverters in September 2025. The new finding is fictional.

Likely effects: the energy sector and Article 4 come back; the Council worries about scope creep; the Patriots and the S&D raise the citizens' own devices; the Director-General seeks a last joint statement.

7.4 Running notes

These are maximalist running notes for facilitators who want close control. It is entirely possible to let the scenario run; intervening too much is also a failure.

Day 1, briefing. Name the out-of-game contact. Do not skip the thresholds: put the coalition table on the screen and let people count. Say clearly that two member states can block, and that no majority exists in the Parliament without the EPP. Explain the default rule with the proposal itself ("where you agree nothing, the phase-out is 18 months, and you still vote on the whole text"). Explain the -5. Say how many injects you will play. Read the etiquette rules, including no recording, and announce the tap-out. Give five minutes of silence for reading the secret cards.

Day 1, team caucus. The two rooms work very differently. The Council usually starts with costs; the Parliament usually starts with rights and its own role. *Watchpoints:* the Commission should move between the rooms. If it stays in one room the whole time, the other institution will build a mandate the Commission cannot live with. That is legitimate, but hard to reverse, and worth a note for the debrief.

Day 1, corridor talks. This is where cross-team alliances form (Finland with the EPP and the rapporteur; Renew with France and Germany; the Legal Service with Ireland). Note them for the debrief.

Day 1, mandate votes. Check that each mandate covers all thirteen articles and Annex I. A Parliament mandate that the EPP likes but that reaches only 349 seats will fail. A Council mandate that ignores Germany and France will fail. Let a vote fail once: the retry is part of the learning.

Between the days. Build the four-column document carefully, mark the green articles and post it to everyone the same evening; the Director-General gets an editable copy and may prepare compromise wording. Where an institution has no mandate, collect a filled mandate template from each of its members first.

Day 2, opening. Hold the 60-second rule. Let the table agree who chairs which round (Director-General, rapporteur or presidency). If it cannot agree in five minutes, apply the fallback in Chapter 4.

Day 2, rounds. One table, everyone speaks. The chair of the round gives the floor and asks for objections when a text seems agreed; the Director-General tables wording; the lead facilitator enters proposals, counts objections and marks agreed text. *Watchpoints:* if one participant has been silent for a whole round, the second facilitator can ask the chair to give them the floor on a specific paragraph, or send them a private note from their capital or group leadership.

After each inject. The second facilitator logs, by role, every written amendment tabled in reaction and every joint statement agreed. Do not remind anyone that their secret goal depends on it.

The default rule as a strategy. Some players gain if a particular article stays as the Commission proposed it (the phase-out at 18 months, the Commission's designation power, no right of objection); the Commission itself scores well on its unchanged text. Quietly keeping an article open until the end is a legitimate tactic and a good debrief question. Do not prevent it, but make sure everyone knows that the gaps still have to pass the final votes: the lead facilitator reads out the consolidated text with the defaults applied before the votes.

Reputation form. Collect it before the final package, when the outcome is still open. Tally it during the package and the votes; do not announce anything until the reveal.

Final package and votes. The Director-General presents; the chair lists open articles; the lead facilitator reads out the consolidated text with the defaults applied. Formal votes, in role, on the record: first the Commission's position, then the Council threshold, the Council roll call, the Parliament roll call with seats counted aloud. If a vote fails, the Director-General has 15 minutes for one revised package; both vote again, the Council first; note in the log whether the package passed at the first vote.

Reveal. The lead facilitator projects the consolidated final text first. Cards face up, one team at a time. Score the team goals on screen; each team may contest one item. Then the verification circle (15 minutes; Chapter 4). Then the reputation results: announce the most helpful players by name. The "most problematic" results can be applied without public naming if the group would find it hurtful; your teaching judgement decides. Then read out any side agreements. Write all totals on the board.

Failure modes, mapped from Volume 1, Chapter 5:

- **Deadlock on Q1:** first do nothing; the Director-General has every reason to table a compromise (provisional designation confirmed by the member states is the obvious one). Then the chair can narrow the agenda.

- **Premature consensus:** usually on a soft text with long deadlines. Let the reveal do the rest.

- **One participant dominating:** ask the chair to give the floor in a round.

- **Card-hunting** (players trying to guess others' cards aloud and stopping the negotiation): it is part of the game in small doses; if it takes over, remind the room that the reveal is at 15:45.

- **Rules-lawyering** about tests: decide quickly (Chapter 7.5).

- **A checked-out participant:** a private note from their capital or group, or a technical question routed to them.

7.5 Disputes about the tests

The team goals and the secret goals are tests on the final text, and the text will rarely match a test word for word: a tiered phase-out, a ban on new purchases only, ground (a) kept "together with ground (b)", and so on.

When a verifier and a player disagree whether a goal is met, the lead facilitator should decide, following the intent of the goal, and apply the same decision to every player affected. For participants, this is a useful exercise in reading and interpreting a legal text: let the two sides argue their reading briefly before you decide.

A decision about a test concerns only the scoring, never what may be written into the act. When the Legal Service (or anyone else) calls a text "illegal", that is a political argument, not a ruling: the institutions decide.

Four readings are settled in advance and printed in the factsheet ("How the tests read"): sectors are counted by the numbered items of Annex I, and item 6 counts as a core sector only if it is reduced to electronic communications networks; the penalty tests read the percentage figure written in Article 10; a "formal right to object" means a right of the Parliament to block designations, the list under Article 4 or amendments to Annex I; and "no third country is named" counts any naming, including a country named in a clause protecting allies.

7.6 Debrief kit

The debrief has four steps (Volume 1, Chapter 5). The reveal (Chapter 7.4) comes before it.

1. Decompression (5 minutes)

Out of role. One sentence each: how do you feel?

2. Shared reality (10 minutes, never skip)

What did the final text say on each of the five questions? Who voted how? What did the reveal show?

3. Institutional questions (20 minutes)

Choose three or four:

1. Two member states could block. Who threatened to, and was it credible? What did the threat buy?
2. Which secret goals shaped your team's position without the team knowing? Is that how real institutions work?
3. Did the injects change the text, or only the speeches? Should law respond to headlines?
4. Did the rapporteur's group size matter? How does a small group lead a file?
5. Security, cost, rights: which one lost in your text, and who paid for it?
6. Was the reputation form fair? Would you negotiate with the same people again?

4. Reality bridge (10 minutes)

Use Appendix B: what the real proposal says and where the real negotiation stands. Ask: what would you expect the real outcome to be? Announce the homework (Chapter 8.3).

7.7 Variants

- **One day:** run day 1 as a morning (briefing, caucus, short hearings, mandate votes in 2 hours) and the trilogue from lunch, with three rounds and two injects. Tell the room at the briefing how many injects you will play.
- **Mandates online, day 2 in person:** the mandate negotiation can, if need be, be done in an online session, but that makes a weaker and less engaging simulation. Watching people struggle with a mandate they formulated a few hours earlier is much more interesting and offers better teaching opportunities.
- **Without secret cards:** play only the team goals. Simpler, but the scenario loses its main lesson; not recommended.

- **Two tables:** with 16 or more participants, run two full casts in parallel and compare the texts in a joint debrief.

Chapter 8 - Communication templates

8.1 Role-assignment email

Subject: Pirate Academy finale: your role in the Cybersecurity Act 2 simulation

Dear [name],

For the Cybersecurity Act 2 simulation on [dates], you will play **[role]** in the **[Parliament / Council / Commission]** team.

Attached are the general factsheet, the Commission proposal and your personal role handout. The handout is confidential: it contains your secret goals. Please do not share it with anyone, including members of your own team.

Please read all three documents before day 1. Most important: the decision rules and the team goals in the factsheet, the thirteen articles of the proposal, and your own secret goals.

See you on [date] at [time], [place].

[signature]

8.2 Pre-session announcement

The Cybersecurity Act 2 simulation starts on [date] at [time] in [place].

Over two days you will negotiate a teaching version of a real EU law that is being negotiated right now: rules on which technology vendors are too risky for Europe's critical infrastructure, and what happens to their equipment. Three teams (the Parliament, the Council and the Commission) have public goals. Every player also has secret goals.

Please bring a laptop, read the factsheet, the Commission proposal and your role handout, and arrive on time: the first block is the briefing.

8.3 Post-session message and homework

Thank you for two intense days. Your final text [was adopted / was not adopted]. [One or two sentences on the outcome.]

Homework (optional): the real Cybersecurity Act 2 is still being negotiated. Find the latest news on the file (procedure 2026/0011(COD) in the Parliament's Legislative Observatory) and write half a page: on the five questions of the simulation, how does the real negotiation compare with your text? Where do you expect it to end? AI tools are allowed for editing and research with a one-line disclosure.

Appendices

Appendix A - Inject log template

Inject	**Time played**	**Written amendments tabled in reaction (by whom)**	**Joint statement (yes/no; agreed by)**
1 Operators' letter			
2 Ransomware			
3 Washington			
4 Inverters			

Side agreements signed (parties, content in one line):

Written declarations handed in (role, time, content in one line):

Final votes: first package passed yes / no; retry needed yes / no; Council roll call; Parliament roll call with seats:

Appendix B - The real proposal: debrief sheet

Question	**Teaching proposal**	**Real proposal COM(2026) 11**	**State of play, autumn 2026**
Q1 Who designates	Commission decision after consulting member states	Commission designates third countries and lists high-risk suppliers by implementing act; examination procedure (member-state committee)	several delegations want a stronger national or Council role
Q1 Grounds	(a) jurisdiction, (b) evidence of compromise, (c) record of breaches	designation of third countries on criteria such as laws obliging companies to report vulnerabilities to their authorities, lack of judicial remedies, malicious cyber activity; suppliers established in or controlled from them	legal certainty of the "controlled by" test contested
Q1 Parliament's role	none	implementing acts: limited scrutiny; delegated act to amend Annex II	Parliament's report in preparation
Q2 Phase-out	18 months	mobile networks: at most 36 months from the list's publication; other networks by implementing act	a member-state text of September 2026 reportedly drops the fixed 36 months
Q3 Certification	one Union scheme replaces national ones	certification voluntary unless Union or national law says otherwise; mutual recognition	contested: voluntary versus mandatory, mutual recognition

Question	Teaching proposal	Real proposal COM(2026) 11	State of play, autumn 2026
Q4 Procedural rights	reasons, 15 working days, no review obligation	right to be heard on preliminary findings, rights of defence, regular update of the list	several delegations push for stronger defence rights
Q5 Scope	eleven sectors	entities under NIS2 (Annexes I and II); key ICT assets; Annex II for telecom networks	Annex II's reach contested
Q5 Penalties	at least 7% maximum	up to 7% for breaching the prohibitions (1% and 2% for other breaches)	proportionality contested
ENISA	resources "necessary"	a larger mandate and new tasks	resources a BUDG question

Appendix C - Facts versus game design

Element	Real or fictional
The CSA2 proposal, its date, its titles, the 36 months and the 7%	real
The thirteen-article teaching text	fictional, modelled on Title IV
The Irish presidency, July to December 2026	real
A trilogue in November 2026	fictional
The rapporteur from the Greens/EFA	real
Seats of the groups	real (July 2024)
The 5G Toolbox, the 2023 Commission statement, Germany's 2024 agreement, NÚKIB warnings, Lithuania's law, Salt Typhoon, the Reuters inverter report, the August 2025 statement	real

Element	Real or fictional
Positions and secret goals of all roles	fictional, inspired by public debates
The operators' letter, the ransomware attack, the US letter, the new inverter finding	fictional
The five-state Council with "no more than one against", bloc voting by group, the -5 for no act, the reputation form, the verification circle	game design

The register boundary (Volume 1, Chapter 2): never present an invented number as fact.

Appendix D - Sources and further reading

- European Commission, Proposal for a Regulation on ENISA, the European cybersecurity certification framework and ICT supply chain security (Cybersecurity Act 2), COM(2026) 11, 20 January 2026.
- European Parliament, Legislative Observatory, procedure 2026/0011(COD).
- Council of the European Union, presidencies: consilium.europa.eu.
- European Commission, "Commission announces next steps on cybersecurity of 5G networks", 15 June 2023.
- German Federal Ministry of the Interior, press release on 5G networks, 11 July 2024.
- NÚKIB, warning of 17 December 2018 and warning of 3 September 2025.
- Reuters, "Rogue communication devices found in Chinese solar power inverters", 14 May 2025.
- Central Statistics Office (Ireland), Data Centres Metered Electricity Consumption 2025, July 2026.
- Hogan Lovells, Freshfields, Gleiss Lutz, Covington: client notes on the CSA2 proposal, January to July 2026.